

1 GARY M. RESTAINO
 2 United States Attorney
 3 District of Arizona
 4 THOMAS SIMON
 5 Assistant United States Attorney
 6 Arizona State Bar No. 3857
 7 Two Renaissance Square
 8 40 N. Central Ave., Suite 1800
 9 Phoenix, Arizona 85004
 Telephone: 602-514-7500
 Email: tom.simon@usdoj.gov
 Attorneys for Plaintiff

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CLERK U.S. DISTRICT COURT	
DISTRICT OF ARIZONA	
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8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE DISTRICT OF ARIZONA

10	United States of America,	No. CR-22-01182-PHX-GMS (DMF)
11	Plaintiff,	INDICTMENT
12	vs.	VIO: 18 U.S.C. §§ 1153, 1201, and 2 (CIR-Kidnapping-Aid and Abet) Count 1
13	1. Kristin Pauline Pahe, and	18 U.S.C. §§ 1153, 2241(a)(1), 2246, and 2 (CIR-Aggravated Sexual Abuse- Aid and Abet) Count 2
14	2. Leandra Kim Hill,	18 U.S.C. §§ 1153, 113(a)(3), and 2 (CIR-Assault with a Dangerous Weapon-Aid and Abet) Count 3
15	Defendants.	18 U.S.C. §§ 1153, 113(a)(6), and 2 (CIR-Assault Resulting in Serious Bodily Injury-Aid and Abet) Count 4
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25 **THE GRAND JURY CHARGES:**

26 **COUNT 1**

27 On or about March 10, 2022, in the District of Arizona, within the confines of the
 28 San Carlos Apache Indian Reservation, Indian Country, defendants, KRISTIN PAULINE

1 PAHE and LEANDRA KIM HILL, Indians, did unlawfully seize, confine and kidnap
2 victim, S.P., and hold her for any purpose.

3 In violation of Title 18, United States Code, Sections 1153, 1201 and 2.

4 **COUNT 2**

5 On or about March 10, 2022, in the District of Arizona, within the confines of the
6 San Carlos Apache Indian Reservation, Indian Country, defendants, KRISTIN PAULINE
7 PAHE and LEANDRA KIM HILL, Indians, did knowingly engage in and attempt to
8 engage in a sexual act with the victim, S.P., by using force against her and by threatening
9 and placing her in fear that she would be subjected to serious bodily injury and kidnapping.
10 The sexual act involved the penetration, however slight, of the victim's genital opening by
11 an object consistent with a lipstick container, with an intent to abuse, humiliate, harass and
12 degrade the victim and arouse and gratify the sexual desire of any person.

13 In violation of Title 18, United States Code, Sections 1153, 2241(a)(1), 2246 and 2.

14 **COUNT 3**

15 On or about March 10, 2022, in the District of Arizona, within the confines of the
16 San Carlos Apache Indian Reservation, Indian Country, defendants, KRISTIN PAULINE
17 PAHE and LEANDRA KIM HILL, Indians, did knowingly and intentionally assault
18 victim, S.P., with a dangerous weapon, that is, a machete, with intent to do bodily harm.

19 In violation of Title 18, United States Code, Sections 1153, 113(a)(3) and 2.

20 **COUNT 4**

21 On or about March 10, 2022, in the District of Arizona, within the confines of the
22 San Carlos Apache Indian Reservation, Indian Country, defendants, KRISTIN PAULINE
23 PAHE and LEANDRA KIM HILL, Indians, did knowingly, intentionally and recklessly
24 assault victim, S.P., resulting in serious bodily injury.

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1 In violation of Title 18, United States Code, Sections 1153, 113(a)(6) and 2.
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5 A TRUE BILL
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A TRUE BILL
s/
FOREPERSON OF THE GRAND JURY
Date: September 13, 2022

GARY M. RESTAINO
United States Attorney
District of Arizona

s/

THOMAS SIMON
Assistant U.S. Attorney